

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

NATHAN ROBERTS and FREEDOM  
TRUCK DISPATCH LLC, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

PROGRESSIVE PREFERRED INSURANCE  
COMPANY; PROGRESSIVE CASUALTY  
INSURANCE COMPANY; CIRCULAR  
BOARD LLC,

*Defendants.*

Civil Action No. 1:23-cv-01597

JUDGE PATRICIA A. GAUGHAN  
Magistrate Judge James E. Grimes, Jr.

**MOTION FOR THE ADMISSION,  
*PRO HAC VICE*, OF LUCIA GOIN AS  
COUNSEL FOR *AMICI CURIAE***

Pursuant to Local Civil Rule 83.5(h), I hereby move for the admission, *pro hac vice*, of Lucia Goin, an attorney at The Southern Poverty Law Center located at 1101 17th St NW, Suite 705, Washington DC 20036 and a member in good standing of the District of Columbia state bar (DC Bar No. 330418), as counsel in this case for *Amici Curiae* The Southern Poverty Law Center, the National Hispanic Bar Association, and Asian Americans Advancing Justice. The declaration of Lucia Goin is filed herewith.

Date: December 21, 2023

Respectfully submitted,

*s/ Lucia Goin*

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Lucia Goin (DC Bar No. 330418)  
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**CERTIFICATE OF SERVICE**

I certify that, on December 21, 2023, I electronically transmitted the attached MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF LUCIA GOIN AS COUNSEL FOR *AMICI CURIAE*, its accompanying declaration, and proposed order using the CM/ECF system. Notice of Electronic Filing will be sent to all CM/ECF registrants for this matter.

Signed: *s/ Lucia Goin*

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*Attorney for Amici Curiae The Southern Poverty  
Law Center, Hispanic National Bar Association,  
and Asian Americans Advancing Justice – AAJC*